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February 5, 2021

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 8377. SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', with the date 'February 8, 2021' written in blue ink below it.

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litig.*, 14-MD-02543 (JMF)

Dear Judge Furman:

We write to correct an oversight in the December 18, 2020 Order Approving Class Counsel's Rule 23(h) Motion for Approval of Award of Attorneys' Fees and Expenses and Service Awards to Lead Plaintiffs (the "Order") [Doc. No. 8307]. Specifically, Exhibit B to the Order inadvertently omitted the names of two Lead Plaintiffs who are entitled to \$1,000 service awards: Debra Quinn and Jerrod Pinkett. Both Ms. Quinn and Mr. Pinkett were appointed as Interim Settlement Class Representatives in the Court's April 27, 2020 Order Granting Preliminary Approval of Class Settlement [Doc. No. 7877, ¶ 9], and were included in the Settlement Agreement [Doc. No. 7888-1 at 21] and Steve Berman's September 28, 2020 Declaration in Support of Interim Class Counsel's Rule 23(h) Motion for Approval of Award of Attorneys' Fees and Expenses and Service Awards to Lead Plaintiffs ("Berman Decl.") [Doc. No. 8161, ¶ 66]. But both were inadvertently omitted from Plaintiffs' November 10, 2020 Proposed Order [Doc. No. 8247], which explains how they were also omitted from the Court's Order. We apologize for the oversight.

Granting this motion will not alter the \$310,000 total sum of class representative service awards the Court approved in its Order. *See* Doc. No. 8307 at 2, ¶ 8. This sum was calculated on the (correct) assumption that 94 Lead Plaintiffs were receiving \$2,000 service awards, and 122 Lead Plaintiffs were receiving \$1,000 service awards. Berman Decl., Doc. No. 8161, ¶ 72. However, as it currently reads, the Order only lists 120 Lead Plaintiffs receiving \$1,000 service awards on Exhibit B.

Lead Counsel respectfully request the Court grant this letter motion authorizing payment of \$1,000 Service Awards each to Lead Plaintiffs Debra Quinn and Jerrod Pinkett.

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Respectfully,

/s/ Steve W. Berman

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